



Transmission and Distribution System Performance Report

2014

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Introduction

Gas Networks Ireland (GNI) is responsible for developing maintaining and operating the gas transmission and distribution systems. The Transmission and Distribution System Operator Licences and responsibilities were transferred from Gaslink to Gas Networks Ireland on the 1st of August 2015. The Transmission System Operator (TSO) and Distribution System Operator (DSO) licences granted in 2008 are published on the CER website¹. Condition 17 of the TSO licence and Condition 19 of the DSO licence require TSO and DSO to report against a range of criteria in relation to the overall standards of performance of the Transmission and Distribution Systems. The performance standards have been determined by the CER based on performance criteria that had been previously submitted for approval by the CER². These performance criteria may be amended by the CER from time to time by notice to Gas Networks Ireland.

¹ <http://www.cer.ie/document-detail/BGE-and-Gaslink-Transportation-Licences/578/3683,3684,3685,3686>

1.0 Transmission System

1.1 Transmission System Data

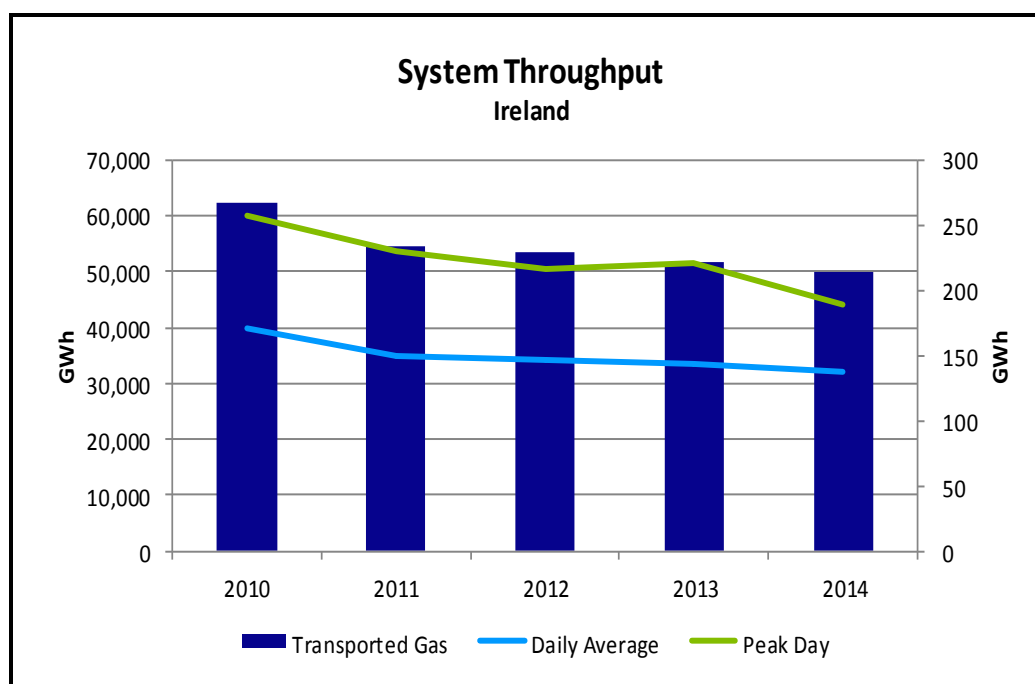
1.1.1 Throughput

Throughput is the total amount of gas transported through the Transportation System in Ireland each year. The total gas transported in Calendar year 2014 includes 51 GWh of fuel gas transported for Northern Ireland (NI) which was consumed at Beattock Compressor Station. Gas transported for the Republic of Ireland (RoI) Power-Gen sector continued to show the decrease seen for 2013 against 2012, a 4.8% decline for 2014 against 2013. Fuel usage of 818GWh for 2014 (which was down on the 829 GWh for fuel usage for 2013) broadly reflected the reduced Total Gas transported for 2014. A Summary of the gas throughput for 2014 is highlighted in Table 1.1.1 and Figure 1.1.1.

Table 1.1.1 Summary of Gas Throughput 2014

Year	Total Gas Transported (GWh)	Daily Average Transported (GWh)	Peak Day Transported (GWh)
2010	62,316	171	258
2011	54,762	150	230
2012	53,541	146	217
2013	51,922	144	221
2014	50,163	137	189

Figure 1.1.1 Summary of Gas Throughput 2014



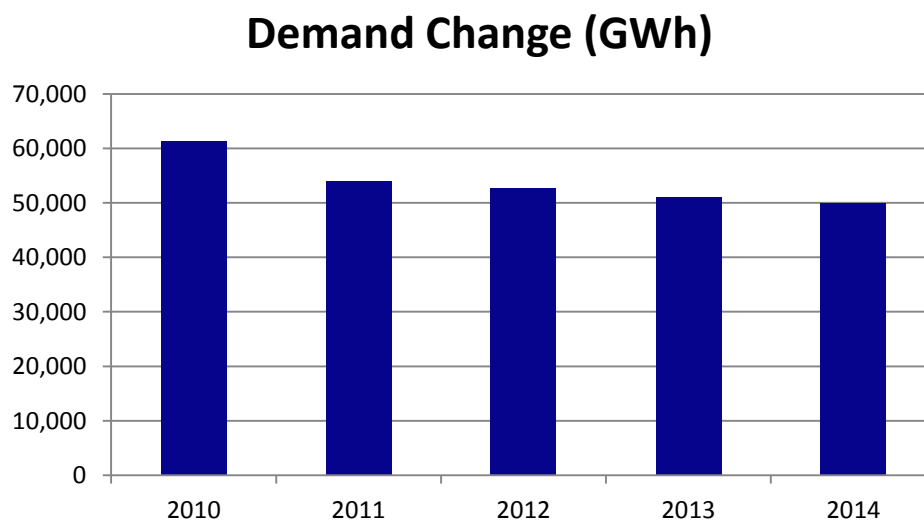
1.1.2 Demand Change

Demand is the total amount of gas physically off-taken from the gas network in the Republic of Ireland (RoI) each year. Table 1.1.2 and Figure 1.1.2 reflect the decreased demand for gas in 2014, down 1.98% from the previous year. A continued increase in the dispatch of Renewable Electricity Sources with the Single Electricity Market combined with the low price of coal is seeing gas fired power plants running less and less. This reduction in the Power Generation sector is being partially offset by an increase in the Industrial and Commercial Sector.

Table 1.1.2 Gas Demand Change 2014

Year	Demand (GWh)	Change (GWh)	Change (%)
2010	61,300	5,101	9.08%
2011	54,007	-7,293	-11.90%
2012	52,721	-1,286	-2.38%
2013	50,981	-1,740	-3.30%
2014	49,970	-1,011	-1.98%

Figure 1.1.2 Gas Demand Change 2014



1.1.3 System Efficiency

(a) Delivery

Table 1.1.3 (a) reflects the amount of gas delivered to shippers as a percentage of the actual nomination amount. The target is to be within Key Performance Indicator (KPI) limits of 99%

of the time. Low hourly flows at Inch can lead to difficulties meeting this KPI. At the Inch Entry Point, compressing gas into the grid at low flow rates requires recycling of the flow for the safe and economical running of the compressors. This has in the past led to difficulties meeting the 99% KPI for nominated versus delivery in the case of Inch entry point. Low hourly flows are a result of shipper / producer requirements. Close co-operation between Gas Networks Ireland and the shippers/producers has resulted in 100% achievement of the KPI in recent years. No such issues currently exists at the Moffat Entry point.

Table 1.1.3 (a) Nominated Gas vs. Delivered

KPI	Nominated vs. Delivered Target	Actual Performance				
		2010	2011	2012	2013	2014
Moffat Delivery ±3%	99%	100%	100%	99.7%	100%	100%
Inch Delivery ±5%	99%	96%	96%	96.7%	100%	100%

(b) Shrinkage Gas

Shrinkage Gas means Own Use Gas and/or Natural Gas required to replace “Unaccounted for Gas” (UAG). Table 1.1.3(b) shows Shrinkage Gas attributed to the RoI system as a percentage of throughputs which stood at 1.3% in 2014. In the transmission system, this is “Own Use Gas” utilized in the 3 compressor stations at Beattock, Brighthouse Bay and Midleton. Shrinkage gas is procured via a tendered contract and recharged to shippers proportionate to the throughput of their customers.

Table 1.1.3 (b) Shrinkage as a % of Throughput

KPI	2010	2011	2012	2013	2014
Shrinkage as a % of Throughput	1.41%	1.31%	1.8%	1.2%	1.3%

(c) Transmission Meter Read Verification

Transmission Meter Read Verification gives an indication of the number of transmission connected gas points that require meter reading adjustments as a result of failed meter reading validation³. Table 1.1.3(c) below notes that 2.0% of all site-metering validation-checks carried out in 2014 resulted in adjustments (i.e. approximately site-metering adjustments that

³ Adjustments typically arise as a result of:

- (i) A communications failure – e.g. a site telemetry failure resulting in advances in the site meter not properly communicated to GTMS via SCADA.
- (ii) An issue with the meter correction equipment on site.

were performed out of 2688 meter-reading validation checks in 2014). GNI has increased the frequency of validation checks from less than 2000 in 2013 which has resulted in an increased number of adjustments being required.

Table 1.1.3 (c) Metering Data Validation

No. Of Adjustments						
KPI	Target	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual
Metering Data Validation	<2% of sites	1.3%	0.9%	0.9%	1.1%	2.0%

1.1.4 Unaccounted for Gas

“Unaccounted for Gas” (UAG)⁴ means Natural Gas which is lost or otherwise unaccounted for from the Transportation System or any localised part thereof. Table 1.1.4 relates to UAG as a percentage of the overall system throughput. UAG can be quite volatile in terms of change month-on-month and year-on-year. It is dependent on a number of factors:

- Operations & Maintenance – Venting of gas, purging of pipelines, meters, gas chromatographs, gas leakage;
- Gas Accounting – If a meter is causing issues resulting in over or under accounting it will require a retroactive adjustment to the meter for the amount incorrectly applied or not.

If the total gas off-taken from the system exceeds the gas brought into the system then it results in a negative UAG which means we have “found” gas i.e. “surplus” gas. This UAG is in fact taken from Gas Networks Ireland’s system stock required for the operation of the pipeline network. Other reasons for “surplus” gas is the rectification of under-accounting issues that is then manually applied at the end of each month. This would also affect the cleansed exit total for each shipper. GNI has maintenance and calibration policies in place for all meters and instrumentation to ensure the accuracy of measurement of gas entering and exiting the system. GNIs general pipeline and AGI maintenance policies seek to prevent leakage and minimise venting of gas.

⁴ Volume as a percentage of total gas.

Table 1.1.4 UAG as a Percentage of the Overall System Throughput

UAG	Target (%)	Throughput (%)	Energy (GWh)
2010	<1	+0.028	+17.6
2011	<1	-0.153	-83.8
2012	<1	+0.020	+12.4
2013	<1	+0.123	+82.3
2014	<1	+0.009	+6.1

1.1.5 Carbon Usage / Emissions

This is a measurement of the tonnes of Carbon Emissions produced at each of the compressor stations based on fuel gas consumption which is highlighted in Table 1.1.5. The emissions should reduce with lower throughput but can increase with high flow variation (e.g. intra-day peaks) which mean the compressors can operate outside of their most efficient operating range.

Table 1.1.5 Compressor Stations Carbon Emissions

Compression site	2010 (tonnes)	2011 (tonnes)	2012 (tonnes)	2013 (tonnes)	2014 (tonnes)
Midleton	4,932	8,528	9,707	8,116	6,536
Beattock	47,318	41,002	44,012	43,186	40,257
Brighthouse	71,440	62,619	58,896	57,302	60,783

1.1.6 Usage of Inventory Product and Storage

Table 1.1.6 below outlines the amount of gas kept in storage during each calendar year.

Table 1.1.6 Gas Storage

	2010 (GWh)	2011 (GWh)	2012 (GWh)	2013 (GWh)	2014 (GWh)
I/C Inventory Space ⁵ Utilised	42	261	106	91	9
Inch Export to Storage ⁶	1468	1576	1670	2122	2179

⁵ "I/C Inventory Space" relates to the IC2 interconnector with GB.

⁶ "Inch" relates to gas that is stored in the depleted Kinsale Gas field.

1.1.7 Capacity Bookings

Exit Capacity is the total amount of capacity booked by shippers on the transmission system. As of 31/12/13, 207.3GWh was the total exit capacity booked (Power, Daily Metered (DM), Industrial & Commercial (I&C), Non-Daily Metered (NDM) and Shrinkage.

Table 1.1.7 (a) Capacity

Exit Capacity bookings (kWh)	31/12/2013	31/12/2014
Power	86,443,593	95,862,000
DM IC	17,236,525	37,692,205
NDM	98,419,126	97,127,877
Shrinkage	5,226,501	5,044,800
Total	207,325,745	235,730,081
Distribution Supply Point Capacity (kWh)		
DM IC	17,524,067.64	17,838,242
RES	70,036,711.23	68,891,063
NDM IC	28,309,425.91	28,903,865
Total	115,870,204.8	115,633,170

The Moffat and Inch Entry Capacity bookings on 31/12/2014 are as follows:

Table 1.1.7 (b) Entry Capacity Bookings

Capacity bookings (GWh)	31/12/2010	31/12/2011	31/12/2012	31/12/2013	31/12/2014
Inch	35.89	34.494	34.3	37.65	35.7
Moffat	214.28	197	199.5	173.9	153.1
Total	250.17	231.5	233.8	211.55	188.8

1.1.8 Total number of Transmission Connections

The total number of transmission Connections (by category) at year end plus % change from previous year is highlighted in Table 1.1.8.

Table 1.1.8 Total Number of Transmission Connections

Category	31st December 2013	31st December 2014	% change
Transmission LDM	32	34	6.25%
Transmission DM	17	17	0%

1.1.9 Total length of Transmission Pipeline

Table 1.1.9(a) Transmission Pipeline Length

Transmission Pipeline length (Km)			
Onshore Pipeline (km)	2000	Decommissioned (km)	30
Offshore Pipeline (km)	412	Decommissioned	0
Total Length of Pipeline (km)	2,412	Decommissioned	30

1.1.10 Performance Standards

(a) Gas Networks Ireland Transmission Service Standards – Performance 2014

Table 1.1.10 (a) Transmission Service Standards Performance 2014

Customer Commitments	Performance Target	Actual Performance
<u>Maintenance Days⁷</u>		
Unscheduled Maintenance / Interruptions Interruptions due to maintenance	0	0
<u>Safety & Quality</u>		
Reportable Safety Incidents	0	0
<u>Communications & Instrumentation</u>		
GTMS System Availability	99.8%	99.95% (equates to approximately 4 hours downtime in the year)

(b) System Balancing

A Balancing Action means a Balancing Gas Buy or Sell in respect of a Day as required to match the amount of gas entering and leaving the system. The target is to have no more than 12 per quarter.

⁷ See Code of Operations Part G Section 5.1.3(b) - <http://www.gasnetworks.ie/en-IE/Gas-Industry/Services-for-Suppliers/Code-of-operations/Code-of-operations/>

Table 1.1.10 (b) System Balancing

KPI	Target	2010	2011	2012	2013	2014
System Balancing Actions	48 (12 per Qtr.)	37	39	20	22	35
Shipper Imbalance as % of total flow*	N/A	0.24%	0.14%	0.4%	0.22%	0.39%

* This relates to overall system throughput, i.e. section 1.1.1 that is RoI 2014 Total Gas Transported of 50,163GWh.

1.2 GPRO

The GPRO (Gas Point Registration Office) is a register of Gas Points that are operated and maintained by Gas Networks Ireland, Table 1.2 sets out the number of Large Daily Metered (LDM), Daily Metered (DM), and Non-Daily Metered (NDM) registered Gas Points in 2014 as well as requests to change shipper and provides historical consumption.

Table 1.2 Registered Gas Points 2014

Category	LDM	DM	NDM I/C	NDM Domestic	Total	2013 Total	% Change from 2013
Gas Points Registered @ 31 Dec 2014	48 (81 Streams)	213 (219 Streams)	26,737	646,162	673,160	666,903	+1%
Total Gas Points Registered during 2014	1	7	696	6,797	7,501	7,007	+7%
Gas Points Deregistered during 2014	N/A	N/A	33	65	98	176	-44%
Tariff Exempt ⁸ NDM Supply Points @ 31 Dec 2014	N/A	N/A	1,566	6,511	8,077	7,631	+6%
Total Tariff Exempt NDM Supply Points during 2014	N/A	N/A	394	3,434	3,828	4,061	-6%
Change of Shippers Jan-Dec 2014	3	110	3,513	106,124	109,750	117,002	-6%
Historical Consumption Requests Jan –Dec 2014	12	60	1,662	0	1,734	2,482	-30%

⁸ Meter point has no end user assigned and there is no consumption at the site. Eligibility is determined in accordance with Section 4.1 of Market Process Definition Documents MPD7 – Deregistration.

<http://www.gasnetworks.ie/en-IE/Gas-Industry/Services-for-Suppliers/Retail-Market-Messaging/Market-process-defintions/>

1.3 Achievement of Capital Programme

As part of the Price Control⁹ process, the CER and Gas Networks Ireland agree a 5 year program of capital works. The programme includes works relating to reinforcement, refurbishment and new supply related. Additional works outside of the programme can be undertaken in the period if proposed by Gas Networks Ireland and agreed by the CER, e.g. the connection of a new town.

Table 1.3.1 Capital Programme - Reinforcement

Reinforcement	Comment
AGI Capacity Upgrades ^(2 number)	Commissioned and in operation
AGI Capacity Upgrades ^(2 number)	Design Stage
Cluden to Brighthouse Bay Pipeline	Design Stage

Table 1.3.2 Capital Programme - Refurbishment

Refurbishment	Comment
Operations Upgrades - Works identified or refurbishment or replacement of obsolete/unreliable system components identified by Operations staff. Multi location projects.	
Ballough Bypass	Design Stage
National Pipeline Marker Upgrade Phase 2	Construction Complete
Limerick Optimisation	Construction Ongoing
Ballymun Pipeline Interchange Diversion	Commissioned and in operation
AGI Boiler Replacement ^(6 number)	Commissioned and in operation
AGI Boiler Replacement ^(7 number)	Design Stage
AGI Waterbath Replacement ^(2 number)	Commissioned and in operation
AGI Waterbath Replacement ^(4 number)	Design Stage
AGI Site Instrumentation ^(16 number)	Commissioned and in operation
AGI Site Instrumentation ^(22 number)	Design Stage

Table 1.3.3 Capital Programme - Third Party

Third Party	Comment
Twynholm Metering Upgrade	Commissioned and in operation

⁹ <http://www.cer.ie/docs/000448/cer12196.pdf>

Table 1.3.4 Capital Programme - Interconnectors

Interconnectors	Comment
Brighthouse Station Outlet Valve Replacement	Commissioned and in operation
Brighthouse Bay and Beattock Pipework Modifications	Construction Ongoing
Brighthouse Bay Turbine Air Intakes	Design Stage
Brighthouse Bay Fuel Gas Skid Upgrade	Design Stage
Beattock Turbine Ancillary Equipment Upgrade	Construction Ongoing
Beattock Actuator Upgrades	Design Stage
Beattock Solenoid Upgrades	Design Stage

Table 1.3.5 Capital Programme – New Supply

New Supply	Comment
Newtownfane to Haynestown (Mullagharlin)	Construction Complete
Gas to Glanbia Waterford	Commissioned and in operation

1.4 Transmission Gas Safety

1.4.1 High Level Safety Statistics

1.4.1.1 Introduction

This section of the report is an extract from quarterly reports submitted to the CER under the natural gas safety regulatory framework (the 'Framework'). All information has been provided to the best ability of Gas Networks Ireland at the time of submittal to the CER. The report includes KPI measures and statistics that have been under continuous monitoring during 2014. The purpose of the KPI's are to identify opportunities for improvement and to ensure the Network continues to be managed in a safe manner.

1.4.2 Key Performance Indicators Metrics

1.4.2.1 High Level Transmission Safety Metrics

The reference number (ref: 1 – 5) denotes metrics grouping under the Key Safety Regulatory Objectives.

Table 1.4.2.1 - High Level Transmission Safety Metrics

	Items	Compliance Monitor					Notes:
			2011	2012	2013	2014	
1A	Public Reported Escapes (PREs) (Reported Leaks)	Total Reported Escapes	4	9	13	6	All leaks were minor in nature and were repaired by Gas Networks Ireland technicians by standard reactive maintenance (e.g. tightening of flange).
1B	Third Party Damage	Development enquiries requiring action	869	875	990	816	
	Third Party Damage Prevention Detected Encroachment Events	Category A - Pipeline Damage or Leak	0	1	0	0	
		Category B - Serious Potential for Damage	20	19	29	20	
		Category C - Limited Potential for Damage	25	22	16	19	
		Total detected encroachment	45	42	45	39	Encroachments are outside the control of GNI. Through proactive engagement with landowners as well as the “Dial before you Dig” campaign GNI seeks to minimise the number. Activity levels in the construction industry has the largest effect on this metric.
1C	Transmission Pipelines	Line breaks (major leakage)	0	0	0	0	
		Line damaged (sustainable level of leakage)	0	1	0	2	
		Line damaged (no leakage)	0	1	0	0	

	Items	Compliance Monitor					Notes:
			2011	2012	2013	2014	
2A	Pressure Control	Occasions where pressure drops below minimum design pressure	0	0	0	0	
		Occasions where pressure is greater than 1.1 x Maximum Operating Pressure	0	0	0	0	
2B	Gas Outages	Number of Unplanned Outages	0	0	0	0	
3A	Gas Quality	Number of non-compliant events (constituent parts outside criteria)	0	0	1	0	
3B	Gas Quality	% Availability of the gas measurement equipment	100%	100%	100%	100%	
4A	Gas Supply Emergencies	Local Gas Supply Emergencies 1,000 - 9,999 customers affected	0	0	0	0	
		NGEM Emergencies > 10,000 customers affected	0	0	0	0	
4B	Gas Emergency Exercises	Emergency Exercises planned per annum (Minimum)	2	2	2	2	
		Emergency Exercises undertaken	4	5	3	2	
5A	Incidents	Gas Related Incidents	0	0	0	0	

1.4.2.2 Analysis of 2014 Transmission Safety Metrics

Commentary on the high level metrics is presented under the key Regulatory Objectives, which support the overall Strategic Objective of the Framework. This is consistent with one of the fundamental principles of the Framework: that gas safety risks must be mitigated to a level that is deemed to be as low as reasonably practical (ALARP).

(a) Minimising the Risk of Loss of Containment

1A. Public Reported Escapes

There were 6 Public Reported Escapes (PREs) related to leaks on the Gas Networks Ireland transmission network. This was a significant decrease from the 13 reported in 2013. All of the leaks were minor in nature and were repaired by Gas Networks Ireland technicians using standard reactive maintenance and repair methods.

1B. Third Party Damage

Third Party Development works enquiries which potentially impacted on the Transmission network and required action from Gas Networks Ireland decreased from 990 in 2013 to 816 in 2014 (18% decrease). This is likely reflective of the current low levels of activity in the construction sector.

There were 39 encroachments detected in 2014 which is a 13% decrease on the 45 detected in 2013.

Since 2011 Gas Networks Ireland has classified Transmission pipeline encroachments in line with the United Kingdom Onshore Pipeline-operators Association (UKOPA) model, these include:

- Category A;
- Category B; and
- Category C.

Category A is the most severe and would include actual damage to a transmission pipeline, wrap or sleeve. There were no Category A encroachments in 2014, none in 2013 and only one in 2012. Categories B and C relate to a level of potential damage and are differentiated by the actual activity and method carried out in the vicinity of the pipeline. Category B

encroachments are deemed to have serious potential for damage while Category C have limited potential for damage. Gas Networks Ireland review each encroachment and monitor trends closely. A further break down of the encroachment types is provided below.

Table 1.4.2.2 Category A, B and C Damage

Third Party Type	Number of Encroachments By Third Party 2013	Number of Encroachments By Third Party 2014	Activity Type	Number of Encroachments By Activity 2013	Number of Encroachments By Activity 2014
Category A – Damage to a Transmission Pipeline					
N/A	0	0	N/A	0	0
Category B – Serious Potential for Damage					
Contractor	15	8	Drainage installation	4	5
Landowner	8	5	Excavation for services	7	3
Local Authority	4	4	Building Works	1	2
Unknown	1	1	Excavation for repair	5	5
Circus	1	2	Excavation for survey	2	0
			Installation of a Pole/Structure	4	2
			Deepening Ditches	1	1
			Roadwork's	0	2
			Pipe laying	2	0
			Earth Moving	2	0
			Fencing	1	0
Total	29	20	Total	29	20
Category C – Limited Potential for Damage					
Landowner	3	1	Excavation for service	2	4
Contractor	8	14	Deepening Ditches	2	2
Local Authority	2	4	Duct Work		1
Waterways	1	0	Excavation for repair	2	4
Unknown	2	0	Excavation for survey	1	1
			Cable Laying		2
			Roadwork's		1
			Building Work's	1	1
			Installation of Pole/Structure	1	3
			Borehole Drilling	1	0
			Pipe Laying	2	0
			Roadwork's	1	0
			Waterways Repair	1	0
			Other	2	0
Total	16	19	Total	16	19

1C. Transmission Pipelines

Line breaks (major gas leakage events) remained at zero in 2012, 2013 and again in 2014.

(a) Maintaining Safe System Operating Pressure

All Maximum Operating Pressure (MOP) reviews were completed to schedule. There were no overpressure events and no unplanned customer outages. All scheduled AGI maintenance was completed.

(b) Minimising the Risk of Injecting Gas of Non-Conforming Quality

There was no gas quality non-compliant results in 2014.

(c) Providing an Efficient and Coordinated Response to Gas Emergencies

There were no reportable Transmission gas supply emergencies in 2014.

(d) Minimising the Safety Risks Associated with the Utilisation of Gas

In 2014, there were no reportable safety incidents relating to the transmission network or customer installations directly connected to the transmission network. There were two Reportable under Guideline (RuG) incidents in 2014. These were related to a leaking Insulation Joint in Diswellstown AGI and a leaking repair flange on the Seapoint pipeline near Merrion Gates in Dublin 4. In both cases the leaks were pinhole type and were fully repaired.

1.4.3 Natural Gas Safety Regulatory Framework

Gas Networks Ireland fully comply with the Natural Gas Safety Regulatory Framework. The Gas Networks Ireland Transmission System Operator Safety Case outlines in detail how this is achieved.

Gas Networks Ireland safety case was originally submitted to the CER and approved in June 2009. Within the safety case framework a quarterly KPI report is submitted to the CER for review. A number of updates to the Safety Case have been made since 2009 and have been accepted by the CER. The Safety Case describes the arrangements that are in place for:

- The safe control and operation of the transmission system.
- The management of the life cycle of the assets including design, construction, commissioning, maintenance and repair, reinforcement and renewal and decommissioning and abandonment.
- Ensuring that staff meet the required standards of qualification and competence.

- Emergency preparedness.
- Ensuring that gas transported in the network meets required standards for gas composition and quality.
- Hazard assessment and mitigation of the risks to a level that is as low as is reasonably practicable associated with the transportation of gas.
- Compliance with relevant standards and codes of practice.
- Cooperation with third parties.

Under the Natural Gas Safety Regulatory Framework, Gas Networks Ireland is required to conduct a full review of its safety case every three years to ensure that the safety case remains a 'living document' and fully reflects the current safety operating measures and practices. An independent body was commissioned to support this 'Triennial' review and to provide external assurance. The review was initiated in 2012 and completed in 2013 with a detailed report issued to the CER. There were a number of recommendations and a programme was agreed with the CER to implement/address the recommendations. Further updates are planned for 2015 to reflect continued planned improvements within the Networks business and the incorporation of Gas Networks Ireland as a legal entity.

1.4.3.1 Update on National Gas Emergency Manager Activities

Pursuant to SI 697 Section 19B of 2007, the CER appointed Gaslink as the National Gas Emergency Manager (NGEM) and approved the Natural Gas Emergency Plan (NGEP) submitted to the CER in November 2008. Revision 3 of the NGEP was updated in late 2013 and approved by the CER in January 2014. Gas Networks Ireland assumed all responsibilities in this regard on the 1st of August 2015.

1.4.3.2 Compliance with Transmission System Standards

(a) General Statement of Compliance

Gas Networks Ireland are compliant with the standards set out in the Transmission System Standards document¹⁰.

¹⁰ This document contains a list of the Engineering, Safety and other standards to which GNI operates. It is updated annually and sent to the CER.

(b) Transmission System Standards

Safety is an inherent consideration in all design standards. Gas Networks Ireland processes and procedures ensure that the Transmission system is designed in a safe manner and to the highest standard.

This commitment is reflected in Gas Networks Ireland’s “Transmission System Standards” document (as approved by the CER). The Transmission System Standards covers without limitation, the engineering of pipelines and associated equipment and the technical standards to be adopted for the design, construction, operation and maintenance, including standards relating to the physical durability of the transmission system (including its ability to withstand internal and external pressures, shocks and damage, whether natural or man-made) and standards relating to the odourisation of natural gas.

(c) Compliance with Licence Conditions

Gas Networks Ireland has system operator and system owner licences. Gas Networks Ireland maintains a log in which reported compliance breaches are noted, investigated and reported. There were no material breaches of the Transmission Asset Owner Licence Conditions or the Transmission Operator Licences during 2014.

1.4.3.3 Other Improvements/Initiatives during the Year

(a) Code Modifications¹¹

The following Code Modification Proposals were addressed during 2014:

Table 1.4.3.3 Code Modifications

Total Number of New Proposals in 2014	Total Number of Outstanding Proposals in 2014 (from 2013)	Total Number of Proposals Approved in 2014	Total Number of Proposals Approved & Implemented in 2014	Total Number of Proposals Rejected in 2014	Total Number of Proposals ‘on hold’ at end of 2014
6	0	2	2	1	0

¹¹ <http://www.gasnetworks.ie/en-IE/Gas-Industry/Services-for-Suppliers/Code-of-operations/code-mods/>

The following Code Modifications were approved and implemented during 2014:

- A060 'Entry Capacity Trades'
- A061 'Exit Tolerances'

The following Cod Modification proposal was rejected in 2014:

- A059 'LDM Change of Shipper Arrangements'

2.0 Distribution System

2.1 Customer Service

Gas Networks Ireland connects all natural gas customers to the network and is responsible for carrying out related work at customer premises. The services provided include: safety and emergency response, pipeline service laying and modification, and meter installations/alterations. Every effort is made to provide services in a prompt, efficient, safe manner and to a high standard. Gas Networks Ireland continuously seeks to improve the levels of service that it provides. The Gas Networks Ireland Customer Charter¹² provides assurances to customers regarding the standards to which these services are provided. In certain circumstances, Gas Networks Ireland is required to provide compensation for failing to meet these standards, where the customer makes a claim. Table 2.1.1 illustrates the performance standards as per the Customer Charter.

¹² <http://www.gasnetworks.ie/CustomerCharterHTML/>

Table 2.1.1 Gas Networks Ireland Customer Charter Service Standards – Performance 2014

Gas Networks Ireland Customer Charter Service Standards - Performance 2014						
Section	Customer Commitments	Total Occurrence	% Achieved	PPL** Standard	No. Of Claims	Compensation Paid
2.1.2.1	Call Handling					
	Calls Answered <20 secs	310,027	91.70%	80%		
	Calls Abandoned	32,580	8.80%	7%		
	Mystery Shopper Calls	742	100.00%	n/a		
	Call Follow-up Surveys	902	100.00%	n/a		
2.1.2.2	Quotation Issuing					
	Quotations Issued <7 w/days	3,643	100.00%	100%		
2.1.2.3	Complaint Resolution					
	10 w/days	1,933	100.00%	85%		
	30 w/days	18	100.00%	85%		
2.1.2.4	Payment Guarantee					
	Compensations/Refunds Paid	38	100.00%	100%		
2.1.3.1	Appointment Granting					
	< 5 w/days	64,325	99.90%	100%	11	€470
	< 20 w/days	3,296	99.70%	100%		
2.1.3.2	Appointment Kept					
	Metering as promised	70,519	99.28%	100%	17	€870
	Services as promised	3,043	99.54%	100%		
2.1.3.3/4	Reinstatement					
	Temporary <1 w/day	5,826	97.33%	100%	0	€0
	Permanent <20 w/day	6,531	96.67%	100%		
2.1.4.2	Supply Restoration					
	Gas on <24 hr	14,751	99.94%	100%	8*	€725
2.1.4.1	Emergency Response					
	Attend Site <1 hr	19,055	99.90%	97%		

* 2 x €235 = gas supply restoration, 6 x €490 = gas supply interruption

** Planned Performance Levels

2.1.1 Customer Service – Performance on Charter Commitments

Gas Networks Ireland's performance across a range of customer service perspectives is measured relative to Gas Networks Ireland Customer Charter standards and Planned Performance Levels (PPL's) agreed with the CER and published in March 2007. An updated version of the Gas Networks Ireland Customer Charter document was published in 2014 as part of the Gas Networks Ireland rebrand but the commitments remain as originally agreed with industry and the CER.

2.1.2 Administrative Standards

2.1.2.1 Call Handling

There were a total of 337,918 calls answered in 2014, representing an 11% increase in call volumes compared to 2013. 91.7% of calls were answered in 20 seconds or less, successfully achieving the 80% call answering target.

A total of 32,850 calls were abandoned, which is 8.8% of total calls offered in 2014. However the real rate of abandon is considered to be those customers who hang up a call after hearing our 'welcome message' (after 10 seconds). Gas Networks Ireland experienced our highest level of abandon on the emergency phone line, once customers hear the message that this is an emergency phone line for reporting suspected gas escapes. The real rate of abandon in 2014 was 1.2%, compared to 0.79% in 2013 and 2% in 2012.

2.1.2.2 Quotation Issuing

2014 quotation performance remained highly compliant at 100% issued within seven working days. The average turnaround was one day for domestic quotes and 2 days for I&C quotes. Overall there were no quotations issued outside the standard.

2.1.2.3 Complaint Resolution

Complaints registered to Gas Networks Ireland from customers in 2014 were 2329 up 15% on the 2014 registered in 2013, the number of complaints in 2012 was 2066. This increase was due to increased activity levels in all sectors including new connections and meter replacements despite the increase, resolution compliance still remained at 100% compared

to the Planned Performance Level at 85% minimum. 2,329 complaints were closed-out during 2014, with no complaints resolved beyond the target date. The nature and relative frequency of complaint types registered is highlighted in Table 2.1.2 and Figure 2.1.2.

Table 2.1.2.3 Customer Complaints

Complaint Type	2014		2013		2012	
	Number of Complaints	% of Overall Complaints	Number Of Complaints	% of Overall Complaints	Number Of Complaints	% of Overall Complaints
Meter Related	722	31%	634	31%	689	33%
Appointment/service	269	12%	300	15%	346	17%
Site Management	284	12%	365	18%	249	12%
Damage to Property	124	5%	148	7%	174	8%
Reinstatement	98	4%	102	5%	91	4%
Technical	91	4%	90	4%	92	4%
Gas Supply	195	8%	44	2%	109	5%
Service Quality	90	4%	39	2%	66	3%
Charging	100	4%	81	4%	81	4%
Connections	122	5%	108	5%	68	3%
Gasworks	17	1%	24	1%	45	2%
Misc (System)	177	8%	64	3%	28	1%
Notice of Works	40	2%	15	1%	28	1%
Grand Total	2329	100%	2014	100%	2066	100%

Site Management – Inconvenience to the customer caused by a site currently being in or left in poor condition such as blocked access.

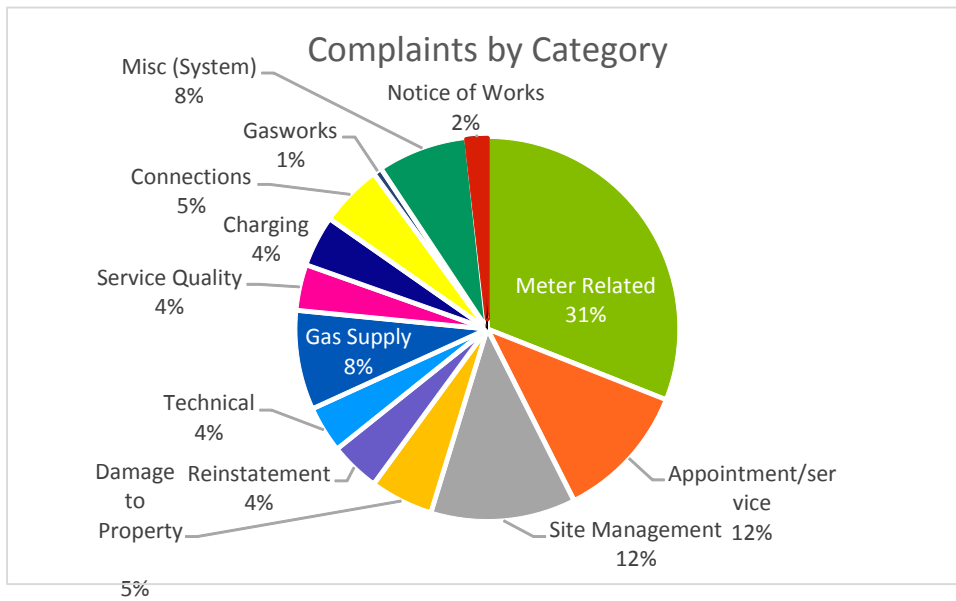
Gas Supply - Disruption to customer’s gas supply in the form of bad pressure or a delay in restoration.

Gasworks – Customer dissatisfied with quality and finish of pipework after Gas Networks Ireland works.

Misc (system) – Lack of information due to the system not being updated in a timely fashion.

Safety/Technical – Dissatisfied with a technical matter or an issue related to safety following Gas Networks Ireland works or response.

Figure 2.1.2.3 Customer Complaints by Category



2.1.2.4 Payment Guarantee

This section relates to additional payments made if the original payment was not within 10 working days. Charter compensations for 2014 totalled 36 approved/paid (of 36 claimed, 0 rejected) for an aggregate pay-out of €2,065. Of the 36 compensation payments made 17 related to appointment keeping, 11 related to appointment granting, 2 to supply restoration delays and 6 to supply interruption. As all payments were made inside the 10 day criteria, there were no compensation payments made in relation to this standard.

Table 2.1.2.4 Customer Compensation

Compensation Claims				
	2014	2013	2012	2011
Paid	36	38	47	67
Rejected	0	0	1	2
> 10 Working Days	0	0	0	0
Payment Category				
	2014	2013	2012	2011
Supply Restoration	2	9	11	16
Broken Appointment	17	20	34	50
Appointment Granting	11	4	0	1
Reinstatements	0	5	2	0
Gas Supply Interruption	6	0	0	0
Total	36	38	47	67

2.1.3 Service Delivery Standards¹³

2.1.3.1 Appointment Granting

Appointment requests in 2014 were lower than 2013 (meter appointment requests totalled 64,389, down 5.08%, and service appointment requests totalled 3,369 down 1.86%). Compliance with service standards was 99.7% for 2014 while for metering, compliance was 99.9%. Gas Networks Ireland endeavours to achieve 100% compliance with our Customer Charter performance commitments. Throughout the year, 10 service appointments were granted outside the twenty working day standard while there were 64 meter appointments granted outside the 20 working day criteria.

2.1.3.2 Appointments Kept

The total number of appointments granted in 2014 was down 2.2% relative to 2013 at c. 73,500. The performance in terms of appointments kept remained consistently high at 99.28% for metering appointments and 99.54% of service related appointments.

¹³ <http://www.gasnetworks.ie/CustomerCharterHTML/>

2.1.3.3 Temporary Reinstatement¹⁴

Performance in 2014 was slightly down on 2013 at 97.33% conducted within 24hr standard of 5,431 temporary reinstatements. Temporary Reinstatement may be completed outside criteria due to weather conditions such as heavy rain which may cause the cutting to be flooded or the contractor may have access problems (e.g. gates, cars in the way, etc.).

2.1.3.4 Permanent Reinstatement

96.67% of the total 6,756 permanent reinstatement activities during 2014 were performed within the 20 working day planned performance level. Delays in permanent reinstatement can occur for a number of reasons. There may be a delay in obtaining a licence for the work or some permanent reinstatement could be grouped in order to maximise the use of certain materials currently, surface categories (e.g. cement, tarmac) are being grouped to improve efficiencies and increase performance levels.

2.1.4 Gas Supply Standards

2.1.4.1 Emergency Response

Gas Networks Ireland has a statutory responsibility to respond to smells of gas reported by members of the public, across the network. These PREs occurred 19,338 times in 2014 and have a one hour response criteria. Only 25 of 19,338 responses in 2014 were outside the 1 hour maximum standard for 99.9% compliant performance. The average response time across all responses was 28 minutes. 4,624 of these escapes were internal, 3,685 external and 11,029 were no traces.

2.1.4.2 Interruption Notification and Supply Restoration

The target set out in Gas Networks Ireland's Customer Charter¹⁵, approved by the CER is to restore gas supply by midnight of the following day in the event of an unplanned interruption. Of the 14,751 loss of gas supply incidents (i.e. unplanned interruptions), only 9

¹⁴Once a gas service has been installed in an excavation reinstatement of the ground takes three stages: 1. Back filling, 2. Temporary reinstatement (within 24 hours) 3. Permanent reinstatement (within 20 working days). Once the excavation is back filled, it is temporarily reinstated with tarmac to make safe. The purpose of temporarily reinstating the ground is to allow time for the backfill in the excavation to settle so there is a lower chance of the reinstatement sinking in the future. Permanent reinstatement is then carried out in the original material of the site e.g. concrete, cobble lock, etc, (within 20 working days).

¹⁵ <http://www.gasnetworks.ie/en-IE/About-Us/Our-business/Customer-charter--codes-of-conduct/>

were restored outside the 24 hour criteria, making the YTD performance 99.93% for 2014 which is consistent with 99.9% achieved in 2013 when 11 were restored outside the criteria these figures compare favourably with the 2012 figures when 52 were restored outside the criteria when the performance was at a rate of 99.6%. These loss of gas supply incidents are referred to as “no gas” responses. The vast majority or 74.4% of loss of gas supply incidents related to prepaid meters. The percentage of loss of gas supply for prepayment meters has always been historically higher than credit meters because of the required customer interaction and additional technology associated with the meter. Now as the population of these meter types grows the increase in loss of gas supply incidents is to be expected. The high percentage of loss of gas supply associated with prepayment meters are as a result of a number of different reasons including tamper faults, card errors, downstream problems on single appliance situations i.e. boiler resets, boiler issues, battery issues, letting credit run out, causing the boiler to lock out and meter faults.

2.2 Distribution System Data

2.2.1 Annual total, Annual Daily Average and Peak Day Flows

Table 2.2.1, outlines Distribution (Dx), DM, and NDM natural gas flows for both I&C and Residential (RES) market sectors.

Table 2.2.1 Distribution Gas Flows

Dx* DM I/C		2011	2012	2013	2014	% Change
Annual Total	MWh	2,997,560	3,312,979	3,407,738	3,460,876	1.6%
Annual Daily Average	MWh	8,212	9,052	8,412	9482	1.6%
Peak Day Flow	MWh	12,149	12,668	12,541	12,785	1.9%
Dx NDM I&C						
Annual Total	MWh	3,716,728	3,990,528	4,030,462	3,916,686	-2.8%
Annual Daily Average	MWh	10,183	10,903	11,025	10,731	-2.8%
Peak Day Flow	MWh					
Dx NDM RES						
Annual Total	MWh	7,341,417	7,744,001	7,817,915	6,908,094	-11.6%
Annual Daily Average	MWh	20,113	21,158	21,438	18,926	-11.6%
Peak Day Flow	MWh					
Dx NDM Total						
Annual Total	MWh	11,058,146	11,734,529	11,848,376	10,824,780	-8.6%
Annual Daily Average	MWh	30,296	32,062	32,464	29,657	-8.6%
Peak Day Flow	MWh	74,481	71,705	75,507	65,821	-12.8%
Dx Total						
Annual Total	MWh	14,055,705	15,047,508	15,256,114	14,285,656	-6.4%
Annual Daily Average	MWh	38,509	41,113	40,875	39,139	-6.4%
Peak Day Flow	MWh	85,525	84,373	87,913	78,393	-10.8%

2.2.2 Shrinkage

Shrinkage Gas means Own Use Gas and/or Natural Gas required to replace Unaccounted for Gas. Shrinkage as a % of total distribution throughput in 2014 = 0.93% (2013 - 1.31%, 2012 – 0.94%, 2011 – 1.0%).

2.2.2.1 Total number of Distribution Connections

Table 2.2.2.1 Distribution Connections

Connections	2011	2012	2013	2014	% Change from 2013
Dx DM I/C	203	207	203	200	-1.5%
Dx NDM I/C	23,684	23,967	24,054	24548	+2.1%
Dx NDM RES	622,573	626,791	630,921	636012	+0.8%
Dx Total	646,460	650,965	655,178	660760	+0.9%

2.3 Total Length of Pipe in Distribution System

The distribution network operates in two tiers; a medium pressure and a low pressure. The distribution network is predominantly polyethylene distribution pipelines.

Table 2.3.1 Distribution System Length

Distribution System Length				
	2011	2012	2013	2014
Total Length (km)	11,030	11,131	11,218	11,288

Distribution Network Lengths - Systems Lengths at end 2014.

2.4 Achievement of Capital Programme

As part of the Price Control¹⁶ process, the CER and Gas Networks Ireland agree a 5 year program of capital works. The programme includes works relating to reinforcement, refurbishment and new supply related. Additional works outside of the programme can be undertaken in the period if proposed by Gas Networks Ireland and agreed by the CER, e.g. the connection of a new town.

Table 2.4.1 Capital Programmes

High Volume Programmes	Comment
G4 Domestic Meter Replacement	<ul style="list-style-type: none"> • Construction ongoing • 50% Complete • On target to change 28,000 meters in 2015 • Programme to run to end of PC3 in 2017
I/C Meter Replacement PC2	<ul style="list-style-type: none"> • Construction ongoing • 75% complete • Finish date Q1 2015
I/C Meter Replacement Programme	<ul style="list-style-type: none"> • Design & construction ongoing • 5% Complete • Finish Date Q4 2016
PE in Porches	<ul style="list-style-type: none"> • Design and Construction Ongoing • 25% complete • To run until the end of PC3
Kerotest	<ul style="list-style-type: none"> • Construction finalising snag list in Q2 2014 • Post construction risk review to take place in Q2 2014
DX bridge crossings	<ul style="list-style-type: none"> • Design and Construction ongoing • Almost 10% complete

¹⁶ <http://www.cer.ie/docs/000404/cer12194.pdf>

Dublin Metallic Mains	<ul style="list-style-type: none"> • Final 35 locations with very small volumes of metallic main currently being resolved by the contractor. • Remaining sites have inherent unique locational difficulties, which are leading to delays driven by the respective landowners (middle of dual carriage way, listed/protected buildings etc.)
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2.5 New Connections during Year (by category)

Table 2.5.1 New Connections

Meters	2011	2012	2013	2014
One off residential	5,983	4,441	4,631	4,676
New Housing	1,097 ¹⁷	1,288	1,933	2,232
I&C	926	719	857	1,185

2.6 Update on New Towns Receiving Gas

Gas Networks Ireland has carried out numerous feasibility studies on various towns to assess the economic viability of connecting the selected towns to the Distribution Network. These studies are carried out in line with a Gas Networks Ireland Connection Policy ¹⁸ approved by the CER in April 2006 and revised in 2011.

The following is a brief update on the status of New Towns Projects.

2.6.1 Completed New Towns Projects

There were no new towns completed in 2014.

¹⁷ New housing connection records do not currently differentiate between houses and apartments

¹⁸[http://www.gasnetworks.ie/Global/Gas%20Industry/BGN%20Gas%20Industry%20Website%20Content/Gas%20Industry%20Documents/GNI%20Files/Large%20Industrial%20Customers/Connections%20Policy%20v4%200%20effective%201%20October%202015%20reflecting%20CER%20approved%20changes%20\(clean\).pdf](http://www.gasnetworks.ie/Global/Gas%20Industry/BGN%20Gas%20Industry%20Website%20Content/Gas%20Industry%20Documents/GNI%20Files/Large%20Industrial%20Customers/Connections%20Policy%20v4%200%20effective%201%20October%202015%20reflecting%20CER%20approved%20changes%20(clean).pdf)

2.6.2 Approved New Towns Projects

Wexford – In 2014, the main energy users signed Connection Agreements, and in December, 2014, the CER confirmed that Gas Networks Ireland could proceed with the construction. The estimated completion date is Q2, 2016.

Nenagh – In 2014, the main anchor load signed a Connection Agreement. Construction has commenced, and the estimated completion date is Q4, 2015.

2.6.3 Potential additional New Towns

Listowel – A review of options to bring Natural Gas to Listowel town is ongoing.

2.6.4 Reinforcement Performance Review

The reinforcement works completed in 2014 are the list below:

1. Donamede VEC
2. Killiney Hill Road
3. Ulverton Road
4. Mercer Street lower
5. Dublin Industrial Estate DRI
6. Phoenix Park
7. Dolphin Road
8. Whitebarn Road
9. Whitethorn Park
10. Firhouse Road
11. Grange Road

Design work has commenced on the following projects which are scheduled for construction in 2015:

1. Ninth Lock Road
2. Harpurs Lane DRI
3. Wolfe Tone Street Kilkenny
5. Zion Raod

- 6. Glasannon Road
- 7. Oliver Plunkett Avenue
- 8. Jamestown Business Park, Kylemore
- 9. Barrow Street
- 10. Leopardstown Grove

2.7 Distribution Gas Safety

2.7.1 Introduction

This section of the report is an extract from quarterly reports submitted to the CER under the natural gas safety regulatory framework (the 'Framework'). All information has been provided to the best ability of Gas Networks Ireland at the time of submittal to the CER. The report includes KPI measures and statistics that have been under continuous monitoring and improvement during the reported period of 2014. Safety performance is a key priority Gas Networks Ireland.

2.7.2 Key Performance Indicators

2.7.2.1 High Level Distribution Safety KPI's

The reference number (ref: 1 - 6)¹⁹ denotes KPI grouping under the Key Safety Regulatory Objectives for High Level Distribution Safety KPI's as highlighted in Table 2.7.2 as follows:

Table 2.7.2 High Level Distribution Safety KPI's

Ref	Subject	High Level KPI					Notes:
			2011	2012	2013	2014	
1A	Public Reported Escapes	Number of External Leaks Detected	3091	2605	2797	3538	
		Number of Internal Leaks Detected	4693	4660	4806	4480	
1C	Third Party Damage	No. of Main Damages	89	48	59	68	

¹⁹ #3 relates to the Quality of Gas entering the Transmission Network and is not applicable to the Distribution Network

Ref	Subject	High Level KPI					Notes:
			2011	2012	2013	2014	
		No. of Service Damages	482	404	408	457	
1D	Gas in Buildings	Number of 'Gas in Buildings' events (i.e. all gas ingress from external infrastructure)	2	2	1	3	<p>1) Leaking top tee led to 2 LEL gas under the floor of a property.</p> <p>2) Third Party Damage at Industrial Estate, Waterford. Contractors struck a gas main during the installation of a water main using trenchless technology. Evacuation of Childcare Centre (112 people).</p> <p>Third Party Damage to Wall Mounted G40 Medium Pressure Module at Petrol Station, Dublin Road, Dundalk. Causing Leak and evacuation of 35 people.</p>
	Evacuations	No. of Gas Networks Ireland initiated evacuations	2	0	1	5	<p>Office Premises - 15 people evacuated. 16% LEL found internal. Flue incorrectly terminated.</p> <p>Apt building: 7 people evacuated as a result of a failed service riser at a 4bar meter bank.</p> <p>Grafton street, 10 people evacuated due to carbon monoxide readings in the basement of the property.</p>

Ref	Subject	High Level KPI	2011				2012				2013				2014				Notes:
			2011	2012	2013	2014	2011	2012	2013	2014	2011	2012	2013	2014	2011	2012	2013	2014	
																		Industrial Estate, Waterford. Third Party Damage, Contractors struck a gas main during the installation of a water main using trenchless technology. Evacuation of Childcare Centre (112 people). Fuel Station. Third Party Damage to Wall Mounted G40 Medium Pressure Module. Causing Leak and evacuation of 35 people.	
2B	Gas Outages	> 15 Customer affected	1	1	1	0													
		> 100 Customer affected	0	1	1	0													
		> 250 Customer affected	0	0	0														
4A	Gas Supply Emergencies	Local Gas Supply Emergencies 1,000 – 9,999 customers affected	0	0	0	0													
		NGEM Emergencies - >10,000 customers affected	0	0	0														0
4B	Public Reported Escapes	% attended within one hour	99.86	99.90	99.90	99.88													
5A	Incidents (Occurring on Gas Network)	Reportable under Gas Legislation	0	1	1	0													

Ref	Subject	High Level KPI					Notes:
			2011	2012	2013	2014	
	Incidents (Occurring on Gas Network)	Reportable under CER Guidelines	3	1	2	3	<p>1) Fire caused by wheelie bin, TPD/Vandalism with media attention.</p> <p>2) Third Party Damage after contractor struck a gas main during the installation of a water main using trenchless technology. Evacuation of Childcare Centre (112 people).</p> <p>3) Third Party Damage to Wall Mounted G40 Medium Pressure Module. Causing Leak and evacuation of 35 people.</p>
5B	Incidents (Occurring on Customer installations)	Reportable under Gas Legislation	1	0	2	2	<p>1) Explosion due to build-up of gas.</p> <p>2). Gas explosion leading to the destruction of two properties with serious damage to a third. One casualty taken to hospital suffering from significant burns. Two cars destroyed outside the property. Significant damage to the other surrounding properties including broken windows and debris damage. The evacuation of 10 properties over-night.</p>
	Incidents (Occurring on Customer installations)	Reportable under CER Guidelines	0	1	3	6	<p>1) CO Alarm went off Discolouration at boiler. Gas Isolated.</p> <p>2) Leak and Gas Isolated</p>

Ref	Subject	High Level KPI					Notes:
			2011	2012	2013	2014	
							<p>3) Leak and gas isolated.</p> <p>4) Explosion, No injuries, Gas Isolated.</p> <p>5) Internal leak and 7 people evacuated & gas isolated.</p> <p>6) Leak Self Evacuation & Gas Isolated</p>
5C	Non Gas related incidents	Number of Non Gas related incidents attended by Gas Networks Ireland	2	1	0	2	<p>1) LPG Explosion The Occupant of the house sustained burn injuries to her head, for which she received treatment in hospital. Investigation into cause of incident is inconclusive.</p>
6A	Emergency Reports	Total no. of calls received via the 24-hour emergency telephone number (1800 20 50 50)	33206	29504	30672	30519	
6B	Third Party Damage	Total enquiries to 1800 427 747 (inward communication)	1511	3442	3437	2706	
		Total enquiries to distributionDBYD @bge.ie/post/faq/calls (inward communication)	4876	4533	4631	4700	
		Total inward enquiries	6,387	7975	8068	7406	
6C	Carbon Monoxide Helpline	No. of CO-related calls received via the 'Carbon Monoxide Helpline (1800 79 79 79)	2298	1845	1792	1718	

2.7.2.2 Summary of 2014 Distribution Safety KPI's:

Commentary on the high level KPI's is presented under the six key Regulatory Objectives, which support the overall Strategic Objective of the Framework. This is consistent with one of the fundamental principles of the Framework.

(a) Minimising the Risk of Loss of Containment

The KPI's of particular note are:

1A Public Reported Escapes

The number of internal escapes in 2014 was 4480 which is down 326 (7%) from 2013 (4,806).

The number of external escapes in 2014 was 3538 up 741 (26%) from 2013.

1C Third Party Damage

The number of mains hits in 2014 was 68 which was up 9 (15%) from 2013 (59).

The number of service hits in 2014 was 457 which was up 49 (12%) from 2013 (408).

1D Gas in Buildings

There was three gas in building events in 2014 as follows;

- A 250mm/32mm leaking top tee led to 2 LEL²⁰ gas under the floor of a property in Dublin 16.
- Industrial Estate, Waterford. Third Party Damage, Contractors struck a gas main during the installation of a water main using trenchless technology. Evacuation of premises (112 people).
- Filling Station Dundalk. Third Party Damage to Wall Mounted G40 Medium Pressure Module. Causing Leak and evacuation of 35 people.

(b) Maintaining Safe System Operating Pressure

²⁰ **LEL/UEL Lower Explosive Limit / Upper Explosive Limit:** For the combustion of any gas-mixture to occur a number of conditions have to be satisfied including the concentration of the gas which must be within a definite range. The bottom of this range is known as lower explosive limit (or the lower flammable limit) LEL and the top of the range, upper explosion (flammable) limit, UEL. For natural gas 5% (or 5 volumes of gas in 100 volumes of gas / air mixture is the LEL and 15% is the UEL. A mixture of gas in air that is less than 5% V/V or above 15% V/V will not propagate a flame through the mixture.

The KPI's of particular note are:

2B Gas Outages

There were no unplanned outages in 2014.

(c) Minimising the Risk of Injecting Gas of Non-Conforming Quality

There were no non-compliant gas quality events reported.

(d) Providing an Efficient and Coordinated Response to Gas Emergencies

The KPI's demonstrate consistent high performance over the period reported. Of particular note is:

4A Gas Supply Emergencies

There were no gas supply emergencies in 2014 which is consistent with previous years.

4B Public Reported Escapes - % attended within one hour

In 2014 Gas Networks Ireland responded to 99.88% of all PREs within 1 hour. This is consistent with the very high performance levels of 99.9% achieved in both 2013 and in 2012.

(e) Minimising the Safety Risks Associated with the Utilisation of Gas

The KPI's of particular note are:

5A Incidents Occurring on the Distribution Gas Network

Reportable Under Gas Legislation:

In 2014 there was no incident reported under gas legislation.

Reportable Under Guidelines:

In 2014 there were three incidents reported under CER guidelines which occurred on the Distribution Gas Network. The details are as follows:

- Fire caused by wheelie bin, TPD/Vandalism with media attention.
- Industrial Estate, Waterford, 10th June 2014. Third Party Damage after contractor struck a gas main during the installation of a water

main using trenchless technology. Evacuation of the premises (112 people) and loss of gas supply to three commercial premises.

- 6th August 2014, Filling Station, Dundalk. Third Party Damage to Wall Mounted G40 Medium Pressure Module. Causing Leak and evacuation of 35 people.

5B Incidents Occurring Downstream of the Distribution Gas Network (Customer Installations)

Reportable Under Gas Legislation:

In 2014 there were two incidents reported under legislation which occurred downstream of the Distribution Gas Network. The details are as follows:

- Explosion due to build-up of gas.
A suspected gas explosion leading to the destruction of two properties with serious damage to a third. One casualty taken to hospital suffering from significant burns. Two cars destroyed outside the property. Significant damage to the other surrounding properties including broken windows and debris damage. The evacuation of 10 properties over-night.

Reportable Under Guidelines:

In 2014 there were six incidents reported under CER guidelines which occurred downstream of the Distribution Gas Network. 5C Non Gas related incidents

There were two non-gas related incidents attended to in 2014.

- LPG Explosion in Waterford.
- The Occupant of the house an elderly lady (88 years of age), sustained burn injuries to her head, for which she received treatment in Cork University Hospital. Investigation into cause of incident is inconclusive.

(f) Promoting Public Awareness of Gas Safety

The KPI's of particular note are:

6A Emergency Calls Received

The total number of calls received via the 24-hour emergency telephone number (1800 20 50 50) in 2014 was 30,519 which was a slight decrease on 2013 figures. It should be noted that

44% of the calls made to the emergency line were related to gas escapes with 56% of the calls non-emergency related.

6B Dial-Before-You-Dig Enquiries

Number of incoming enquiries received for “Dial-Before-You-Dig” has decreased from 8,068 in 2013 to 7,406 this year.

6C Carbon Monoxide Reports

Gas Networks Ireland are maintaining advertising campaign to ensure continuing awareness. Other initiatives included Carbon Monoxide awareness week in September 2014 and a Carbon Monoxide Alarms promotion with members of the RGI’s. The number of CO-related calls received via the 'Carbon Monoxide Helpline (1800 89 89 89) were marginally down (4% decrease) on 2013 levels.

2.7.3 Natural Gas Safety Regulatory Framework

Gas Networks Ireland fully comply with the Natural Gas Safety Regulatory Framework. The Gas Networks Ireland Distribution System Operator Safety Case outlines in detail how this is achieved.

Gas Networks Ireland’s safety case was originally submitted to the CER and approved in June 2009. Within the safety case framework a quarterly KPI report is submitted to CER for review. A number of updates to the Safety Case have been made since 2009 and accepted by the CER. The Safety Case describes the arrangements that are in place for:

- The safe control and operation of the distribution system.
- The management of the life cycle of the assets including design, construction, commissioning, maintenance and repair, reinforcement and renewal and decommissioning and abandonment.
- Ensuring that staff meets the required standards of qualification and competence.
- Emergency preparedness.
- Ensuring that gas transported in the network meets required standards for gas composition and quality.
- Hazard assessment and mitigation of the risks to a level that is a low as reasonably practical associated with the transportation of gas.

- Compliance with relevant standards and codes of practice.
- Cooperation with third parties.

Under the Natural Gas Safety Regulatory Framework, Gas Networks Ireland is required to conduct a full review of its safety case every three years to ensure that the safety case remains a 'living document' and fully reflects the current safety operating measures and practices. An independent body was commissioned to support this 'Triennial' review and to provide external assurance. The review was initiated in 2012 and completed in 2013 with a detailed report issued to the CER. There were a number of recommendations and a programme was agreed with the CER to implement/address the recommendations. These recommendations have been incorporated into subsequent revisions of the Safety Case. The most recent accepted Safety Case document is dated the 1st December 2014.

Further updates are planned for 2015 to reflect continued planned improvements within the Networks business and the incorporation of Gas Networks Ireland as a legal entity.

2.7.4 Compliance with Distribution System Standards

Safety is an inherent consideration in all design standards. Gas Networks Ireland's processes and procedures ensure the Distribution system is designed and operated in a safe manner and to the highest standard.

This commitment is reflected in Gas Networks Ireland's "Distribution System Standards²¹" document (as approved by the CER). The Distribution System Standards covers without limitation, the engineering of pipelines and associated equipment and the technical standards to be adopted for the design, construction, operation and maintenance, including standards relating to the physical durability of the distribution system.

Gas Networks Ireland are compliant with the standards set out in the Distribution System Standards document.

²¹ This document contains a list of the Engineering, Safety and other standards to which GNI operates. It is updated annually and sent to the CER.

2.7.5 Compliance with Codes of Practice

2.7.5.1 Codes of Practice

Every effort is made by Gas Networks Ireland to provide services in a prompt, efficient and safe manner and to a high standard. This commitment is reflected in Gas Networks Ireland's Customer Charter and three Codes of Practice.

The Gas Networks Ireland Customer Charter benchmarks the performance standards that Gas Networks Ireland strives to achieve and provides assurance to customers of Gas Networks Ireland's commitment to these standards. The three Codes of Practice outline the procedures and processes Gas Networks Ireland adheres to in each of the relevant areas.

The Gas Networks Ireland Customer Charter and Codes of Practice can be found on the Gas Networks Ireland website²² and are as follows:

- Customer Charter
- Vulnerable Customer guide
- Complaints Handling Code of Practice
- Disconnection Code of Practice

The documents above were updated in 2014 as part of the Gas Networks Ireland rebrand.

In accordance with the Transmission & Distribution System Owner / Operator Licences, (Compliance Officer Condition), the Compliance Officer produces an annual report as to its compliance during the relevant year. Compliance training was rolled out to all Networks Employees.

2.7.5.2 General Statement of Compliance

Gas Networks Ireland provides services in a prompt, efficient and safe manner and to a high standard, in accordance with the arrangements set out in the Gas Networks Ireland Customer Charter and in line with the principles set out in the Codes of Practice.

²² <http://www.gasnetworks.ie/en-IE/About-Us/Our-business/Customer-charter--codes-of-conduct/>

General levels of performance compliance (performance relative to published Planned Performance Levels or Service Standards) for 2013 are as outlined in Section 2.1 of this report.

Non-compliances of a procedural nature relating to the conduct of activities covered by the charter & codes listed are added as they arise, to the Regulatory & Compliance general register of non-compliances, maintained by Gas Networks Ireland.

2.7.5.3 Vulnerable Customer Guide²³

A vulnerable customer is a person who is particularly vulnerable to disconnection during winter months for reasons of advanced age or physical, sensory, intellectual or mental health. (S.I. No. 463 2011).

Vulnerable customer” means a household customer who is—

- (a) critically dependent on electrically powered equipment, which shall include but is not limited to life protecting devices, assistive technologies to support independent living and medical equipment, or
- (b) particularly vulnerable to disconnection during winter months for reasons of advanced age or physical, sensory, intellectual or mental health.

Gas Networks Ireland has implemented a Special Services Register (for customers who are listed as vulnerable). As of the 31st of December 2014, there were 7,294 vulnerable customers registered on the Special Services Register.

Table 2.7.5.3 Number of Vulnerable Customers

Number of vulnerable customers 31st December 2014				
Type	Description	Total Customers - 2014	Total Customers - 2013	Total Customers - 2012
1	Visually Impaired	190	170	148
2	Mobility Impaired	561	437	475
3	Hearing Impaired	353	276	261
4	Elderly	6,190	6,635	6,574
	Total Types	7,294	7,518	7,458

²³ <http://www.gasnetworks.ie/en-IE/About-Us/Our-business/Customer-charter--codes-of-conduct/Vulnerable-Customers-Guide-HTML-version/>

2.7.5.4 Complaints Handling Code of Practice

Gas Networks Ireland has implemented a Complaints Handling Procedure. A report on the complaints received and compensation paid as a result of the introduction of this Code are outlined in section 2.1.2.3.

Table 2.7.5.4 Customer Complaints

Complaint Type	2014		2013		2012	
	Number Of Complaints	% of Overall Complaints	Number Of Complaints	% of Overall Complaints	Number Of Complaints	% of Overall Complaints
Meter Related	722	31%	634	31%	689	33%
Appointment/service	269	12%	300	15%	346	17%
Site Management	284	12%	365	18%	249	12%
Damage to Property	124	5%	148	7%	174	8%
Reinstatement	98	4%	102	5%	91	4%
Technical	91	4%	90	4%	92	4%
Gas Supply	195	8%	44	2%	109	5%
Service Quality	90	4%	39	2%	66	3%
Charging	100	4%	81	4%	81	4%
Connections	122	5%	108	5%	68	3%
Gasworks	17	1%	24	1%	45	2%
Misc (System)	177	8%	64	3%	28	1%
Notice of Works	40	2%	15	1%	28	1%
Grand Total	2329	100%	2014	100%	2066	100%

Site Management – Inconvenience to the customer caused by a site currently being in or left in poor condition such as blocked access.

Gas Supply - Disruption to customer's gas supply in the form of bad pressure or a delay in restoration.

Gasworks – Customer dissatisfied with quality and finish of pipework after Gas Networks Ireland works.

Misc (system) – Lack of information due to the system not being updated in a timely fashion.

Safety/Technical – Dissatisfied with a technical matter or an issue related to safety following Gas Networks Ireland works or response.

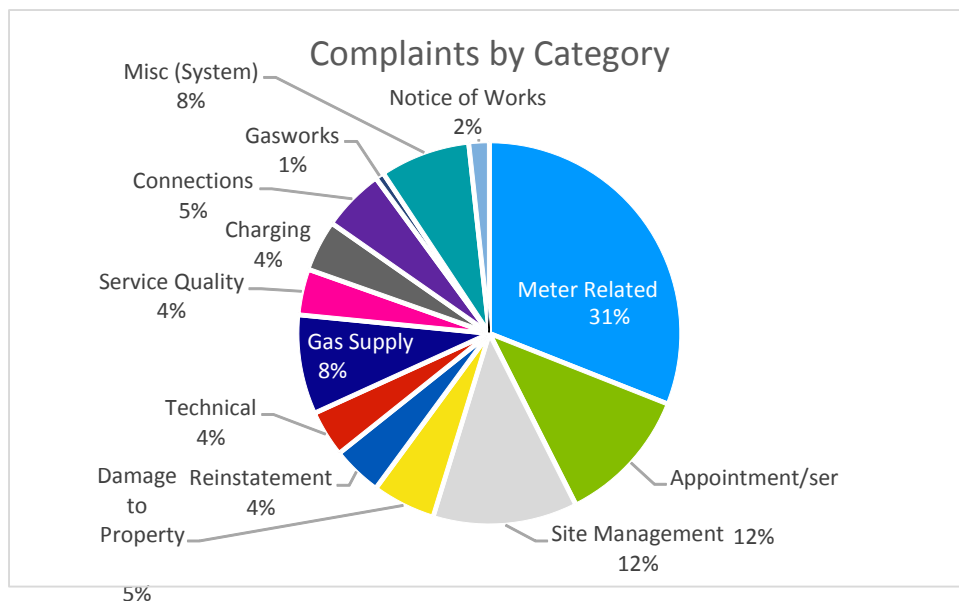


Figure 2.1.2.3 Complaints by Category

2.7.5.5 Disconnection Code of Practice

The disconnection of gas supply at an End User’s premises may be required under a range of circumstances. Because of the inconvenience caused to end users by disconnection a set of practices is set down and followed to ensure that the reason for disconnection is validated, appropriately communicated to the End User and carried out in the correct manner. (See Section 2.7.8 and 2.8 for further information).

Table 2.7.5.5 Disconnection of Gas Supply

Disconnection of gas supply	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual
Total number of Lock Requests Dispatched	9,214	9,538	15,570	13,199	8,824
Total number of Locks failed	4,295	5,323	7,988	7,703	5,072
Total number of Successful Locks	4,912	4,215	6,851	5,496	3,752

2.7.6 Compliance with Licence Conditions

Gas Networks Ireland maintains a log in which reported breaches of compliance are noted, investigated and reported on. There were no material breaches of the Distribution Asset Owner Licence Conditions or the Distribution Operator Licences during 2014 (nor in 2012 or 2013).

2.7.7 Customer Service

Satisfaction Monitoring

The Gas Networks Ireland “Voice of the Customer” measurement programme straddles all customer journeys within the business, incorporating both domestic and commercial customers. Online and call surveys are conducted weekly, with company-wide reporting on monthly and quarterly basis. Customers are asked to fill out a survey, which differs depending on the type of work that was undertaken for the customer and the type of customer they are. All surveys incorporate a feedback loop, contacts stemming from which are dealt with by the customer care team by close of business that day. Core metrics gathered include Net Promoter Score (NPS), Customer Satisfaction Scores (CSAT), Customer Effort Score (CES), in addition to the organisation’s performance across key touch points and against its own brand values. Extensive customer verbatims are also gathered and linked to individual job descriptions to allow for internal process improvements.

W5, Gas Networks Ireland’s independent survey company, phone customers who have contacted the Gas Networks Ireland call centre within one week of the customer’s initial contact to ascertain the level of customer satisfaction with the service provided. Call Back monitoring for 2014 yielded overall satisfaction of 92%. Satisfaction implies a customer giving Gas Networks Ireland a rating of 7-10 (out of 10) in the survey.

Mystery Shopper surveys are carried out by W5 staff who phone the call centre posing as customers and ask a series of questions, complex scenarios are used and reviewed monthly to evaluate the quality of knowledge and personal skills provided by the agents.

Mystery Shopper satisfaction achieves consistently high scores, achieving an overall performance of 89% in 2014, 93% in 2013 and 96% in 2012. To ensure we maximise the potential of this programme of work, we are continuously stretching CSRs by testing them

with highly complex scenarios, the aim being to identify gaps in knowledge or personnel skills so that these can be fed into individual CSR training programmes. The benefits of this programme are realised only by making the scenarios really difficult and aiding CSRs with additional training on outcomes, the benefits of this programme are demonstrated in the callbacks to customers where we have seen a consistent improvement in very satisfied scores.

W5 also carry out surveys to determine satisfaction levels in relation to the following: Complaints (56%), Domestic Connection (89%); Siteworks (88%); Commercial Connection (69%); Public Reported Escapes response (93 %) and Meter Replacement (89 %); Dial before you Dig Service. (90%). Satisfaction implies a customer giving Gas Networks Ireland a rating of 7-10 (out of 10) in the survey.

Table 2.7.7.1 Customer Satisfaction Survey

	Complaints	Callbacks		Mystery Shopping	Domestic Connection	Siteworks	Commercial Connection	Public Reported Escapes	Meter Replacement Programme	Dial B4 You Dig
	Satisfied (7-10)	Satisfied (7-10)	Very Satisfied(9-10)	Satisfied (7-10)	Satisfied (7-10)	Satisfied (7-10)	Satisfied (7-10)	Satisfied (7-10)	Satisfied (7-10)	Satisfied (7-10)
2014	56%	92%	77%	89%	89%	88%	69%	93%	88%	90%
2013	60%	94%	61%	93%	83%	84%	76%	90%	82%	90%
2012	65%	98%	39%	96%	86%	80%	86%	94%	87%	90%

Customer Experience

Every month all the satisfaction results and the key words identified by customers are circulated and discussed with the relevant operation managers and stakeholders with detailed analysis of the results provided. All departments attend quarterly customer experience days where key customer themes are analysed, presented and discussed in a workshop setting.

In order to ensure engagement across the whole of the Networks business, the scores and key words are also published on the staff intranet and network company-wide brief. *Voice of the Customer Recognition Reward* scheme is in place to reward staff and contractors for going above and beyond for our customers.

Customer testimonials²⁴ are available to view on our website; these are updated monthly.

²⁴ www.gasnetworks.ie/customertestimonials

Customer Experience Improvements

The Customer Care team within Gas Networks Ireland continue to put in place initiatives to improve the overall customer experience e.g. YouTube videos to simply explain complex processes to our customers e.g. commercial and domestic connection process, how to read your pre-payment meter, submit a meter reading etc.

Every month all the satisfaction results and the key words identified by customers are circulated and discussed with the relevant operation managers and stakeholders with detailed analysis of the results provided. All departments attend quarterly customer experience days where key customer themes are analysed, presented and discussed in a workshop setting.

In order to ensure engagement across the whole of the Networks business, the scores and key words are also published on the staff intranet and network company-wide brief. *Voice of the Customer Recognition Reward* scheme is in place to reward staff and contractors for going above and beyond for our customers.

Customer testimonials²⁵ are available to view on our website; these are updated monthly.

2.7.8 Site Works Performance

The Gas Networks Ireland Customer Charter incorporates explicit commitments in respect of a range of customer facing services. The prices included in the Site works charging document²⁶ have been determined in the context of continuing to provide these customer facing services in line with those published commitments.

²⁵ www.gasnetworks.ie/customertestimonials

²⁶ <http://www.cer.ie/en/gas-distribution-network-current-consultations.aspx?article=bb4768ef-ab2f-403b-aecd-ae1a3d763f59>

Table 2.7.8 Site Works Services Standards Performance 2014

Gas Networks Ireland Site-works Services Standards – Performance 2014		
Supplier Requested Work Returns		
Meter Related Activity Domestic & Commercial	Standard	Performance
Confirmation Out-turn/Read from Activity *		
-Special Read Requests. **	90% ← 5 w/days. 100% ← 10 w/days.	99.56% ← 5 w/days. 98.85% ← 10 w/days.
-All Other Requests. ***	90% ← 10 w/days. 100% ← 20 w/days.	98.67% ← 10 w/days. 99.33% ← 20 w/days
Appointment Grant for Requests		
-Special Read Requests	100%← 5 working days.	99.67% ← 5 working days.
-All Other Requests	100%← 5 working days.	99.33% ← 5 working days.
Supplier Requested Work Access Standards		
Meter Related Activity Domestic & Commercial	Standard	Performance
Isolation/ Disconnection		
Attended As Appointment Access % Achieved	100% 60%	99.28% 42%
All Other Activities		
Attended As Appointment Access % Achieved.	100% 100%	99.54% 99.54%

*Out-turn is the message sent back to the shipper (complete or no access). There were commissioning issues relating to the transition of data through new computer systems that delayed the reporting of completed activities.

**Special reads are reads requested by customers through their shippers. Special Reads are carried out in instances of dispute with the customer regarding their bills. Gas Networks Ireland carried out 61 of these requested jobs in 2012, an increase from 24 in the previous year. Special reads are charged to the customer.

*** Meter fits, locks, unlocks exchanges etc.

2.8 Disconnections for Non-Payment

The low rate of access 42.31% on shipper requesting credit locks in 2014 is primarily due to inability to access meters located inside customer's homes. When a Gas Networks Ireland representative calls to lock the meter they may be refused access. If the meter is outside, an attempt to lock the meter may occur but the customer will always be told the reason why the representative is there. The Code of Disconnection states that Gas Networks Ireland must inform the customer when they arrive on site as to what their intention is. A "Pay before Lock" system is in place which allows the Gas Networks Ireland representative to offer the customer the facility to ring the shipper/supplier before the lock takes place to agree to a payment plan. If no agreement is reached the representative locks the meter unless access is denied.

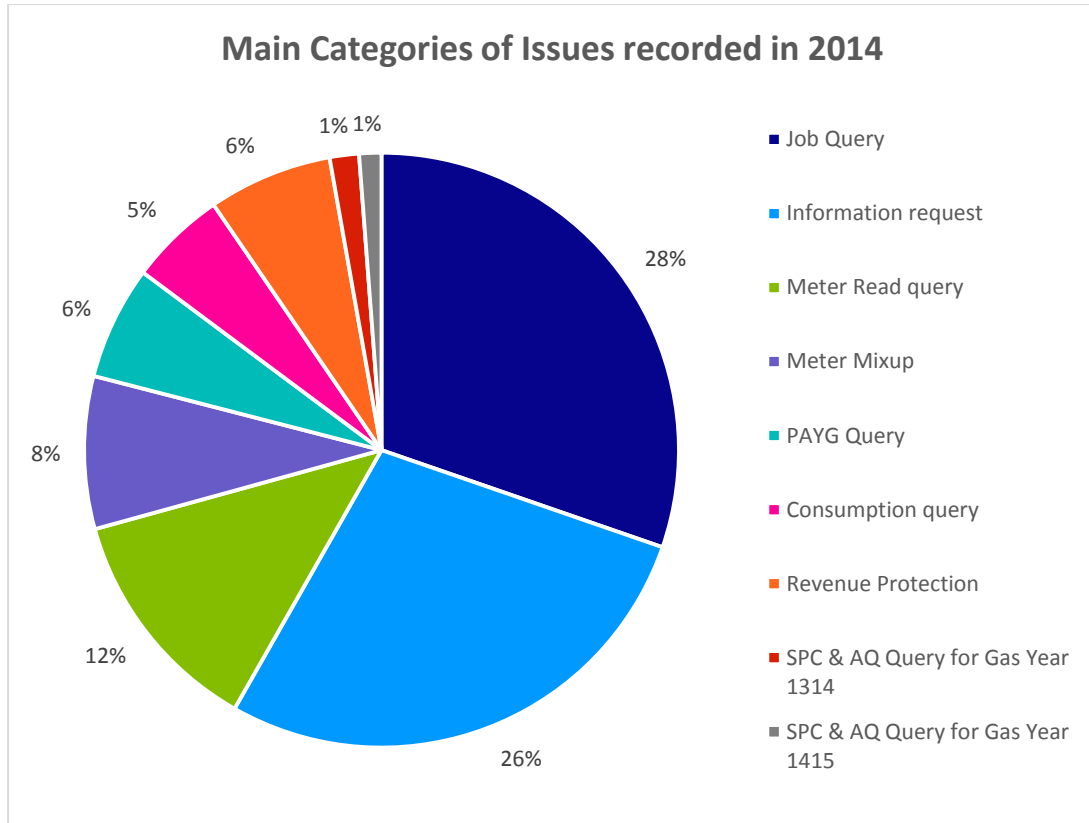
3.0 Other Performance Criteria

3.1 Shipper Issues

3.1.1 Breakdown of Opened Shipper Escalations by Type

There were 3,215 issues escalated to the Shipper Services Key Account Management department in 2014. The main categories of issue recorded are shown in Figure 3.1.1.

Figure 3.1.1 Breakdown of Shipper Issues

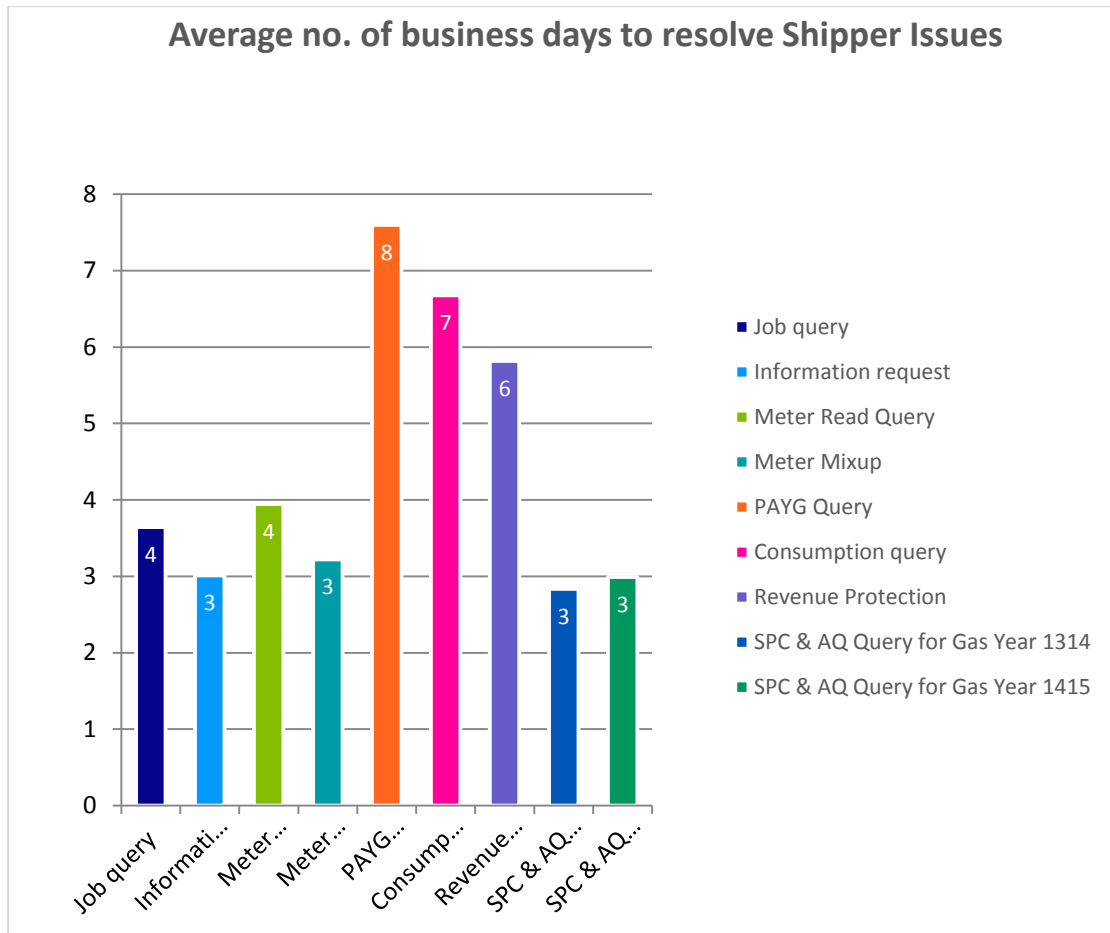


Gas Networks Ireland works with industry at the Gas Market Arrangements Retail Group (GMARG) and Code Mod Forum to agree process changes to reduce some of these issues. Gas Networks Ireland continues to work proactively with Shippers on initiatives to identify possible issues in advance of problems occurring.

3.1.2 Average Number of Business Days that a Shipper Issue was Open

The average length of time that a Shipper issue was open was four business days. The average number of business days to resolve Shippers issues per category is shown in Figure 3.1.2.

Figure 3.1.2 Average Number of Business Days to Resolve Shipper Issues



3.1.3 Shipper Issues Management

All Shipper issues are systematically logged by the Shipper Services Key Account Management function on the Shipper Issues system. Every issue is assigned a unique issue number and Shippers receive an email confirmation where requested regarding the status of their issue within three business days. Gas Networks Ireland provide each Shipper with an issue update every 20 business days thereafter as long as the issue remains open on Gas Network Ireland’s system.

3.1.4 Other Gas Networks Ireland Service Standards

Table 3.1.3 Other Gas Networks Ireland Service Standards

Customer Commitment	Performance Target	Actual Performance 2014
Shipper Operations		
Change of Shipper (NDM)	Process Change of Shipper Requests- 100% <=5 business days	100%
Change of Shipper (DM)	Outgoing shipper notified with >=10 business days' notice	100%
Entry Capacity Booking Requests	Process <=20 days – 100%	100%
Exit Capacity Booking Requests	Process <=20 days – 100%	100%
Meter Reading/ Meter Data Services		
Access Rate	80%	84%
Read Rate	Average 3.2 reads per site per calendar year	3.41
Forecasting, Allocation and Reconciliation (FAR) ²⁷ – Domestic Reconciliation (PPM Meters - 12 month Rolling)	80% within accuracy of 1,250 kWh	99.37%
Forecasting, Allocation and Reconciliation (FAR) – Domestic Reconciliation (Credit Meters - 12 month Rolling)	80% within accuracy of 1,250 kWh	89.54%
Forecasting, Allocation and Reconciliation (FAR) – I&C Reconciliation ²⁸	80% within accuracy of 4,500 kWh	74.98%

²⁷ <http://www.gasnetworks.ie/en-IE/Gas-Industry/Services-for-Suppliers/Capacity-registerFAR/>

²⁸ The I&C band ranges between 73,000 kWh and 5,500,000 kWh so range of reconciliation accuracy can vary significantly given the wide range of annual volumes consumed at these sites.

4.0 Appendices

4.1 Glossary of Terms

AGI	Above Ground Installation	No.	Number
ALARP	As Low as Reasonably Practical	NPS	Net Promoter Score
CER	Commissions for Energy Regulation	PPL	Planned Performance Level
CES	Customer Effort Score	PREs	Public Reported Escapes
CO	Carbon Monoxide	RES	Residential
CSAT	Customer Satisfaction Scores	RGI	Registered Gas Installer
DM	Daily Metered	RoI	Republic of Ireland
DSO	Distribution System Operator	RuG	Reportable under Guideline
Dx	Distribution	SCADA	Supervisory Control and Data Acquisition
FAR	Forecasting, Allocation and Reconciliation	TPD	Third Party Damage
I & C	Industrial & Commercial	TSO	Transmission System Operator
I/C	Interconnector	UAG	Unaccounted for Gas
Km	Kilometre	UKOPA	United Kingdom Onshore Pipeline-operators Association
KPI	Key Performance indicator	UEL	Upper Explosive Limit
KWh	Kilowatt hour		
GMARG	Gas Market Arrangements Retail Group		
GTMS	Gas Transportation Management System		
GWh	Gigawatt hour		
LEL	Lower Explosive Limit		
MWh	Megawatt hour		
MOP	Maximum Operating Pressure		
N/A	Not Applicable		
NDM	Non-Daily Metered		
NGEM	Natural Gas Emergency Manager		
NGEP	Natural Gas Emergency Plan		

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